

CEE Associates, LLC
4411 East Jones Bridge Road
Norcross, GA 30092



RDMS DocID

108443

March 30, 2010

VIA FEDEX

Jan Czczotka
Assistant Director
Remediation Division
Bureau of Water Protection and Land Reuse
Connecticut Department of Environmental Protection
79 Elm Street
Hartford, Connecticut 06101-5127

RCRA RECORDS CENTER
FACILITY CEE ASSOC
I.D. NO. CTD044121697
FILE LOC. R-7
OTHER #108443

**RE: RCRA Corrective Action Requirements and
Achievement of Interim Goals
Former CEE/InteliData Facility, 80 Pickett District Road,
New Milford, Connecticut (the Site)
EPA ID No. CTD044121697**

Dear Mr. Czczotka:

CEE Associates, LLC (CEE) received a letter from the Connecticut Department of Environmental Protection (CT DEP) dated March 11, 2010 (the "March 11 Letter") regarding the above-referenced matter and, as requested, has prepared the following schedule specifying a plan to achieve the RCRA corrective action milestone Construction Complete (CA 550) by September 30, 2010.

The March 11 Letter notes that the only outstanding remedial task at the Site to satisfy the CA 550 goal is the remediation of the PCB-contaminated soils in the vicinity of a transformer owned by Connecticut Light & Power (CL&P). To accomplish this goal, the following schedule of tasks is proposed:

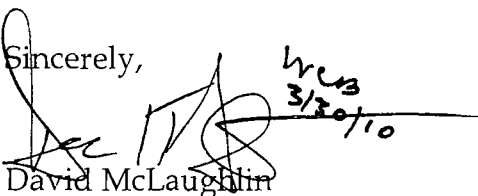
- Excavate and dispose off-site the low level PCB-contaminated soil (above the Residential Direct Exposure Criteria) located outside of the fenced-in enclosure surrounding the CL&P-owned transformer;
- Collect soil and wipe samples of the transformer pad from within the fenced-in enclosure;
- Excavate and dispose off-site any PCB-contaminated soil (above the Industrial/Commercial Direct Exposure Criteria) identified within the fenced-in enclosure; and

- Conduct post-excavation soil sampling and analyses and groundwater monitoring.

Absent any unforeseen issues, CEE expects the excavation and disposal off-site of the low level PCB-contaminated soil (above the Residential Direct Exposure Criteria) located outside of the fenced-in enclosure to occur prior to September 30, 2010. Please note, however, that the collection of soil and wipe samples from within the fenced-in enclosure and the remediation of any PCB-contaminated soil (above the Industrial/Commercial Direct Exposure Criteria) identified within the fenced-in enclosure is contingent upon CL&P's cooperation (either by (a) conducting the required sampling/analyses and, if necessary, remediation, itself, or (b) providing access to the fenced-in enclosure to allow CEE's environmental consultant to conduct the necessary sampling/analyses, and, if necessary, remediation).

The Licensed Environmental Professional for the Site (Robert Drake, LEP of ERM Consulting & Engineering, Inc.) and CEE's counsel (Andrew Davis, of Dewey & LeBoeuf LLP) have been in contact with CL&P (and its parent Northeast Utilities) regarding CL&P's approach to and obligations for addressing the PCBs identified at the Site, but as yet have been unable to obtain CL&P's commitment to addressing this matter. CEE expects further discussions with CL&P and will strive to have all remediation necessary to satisfy RCRA corrective action milestone CA 550 complete by September 30, 2010.

If you have any questions or require any additional information, please contact Kevin King at ERM at (860) 466-8524.

Sincerely,

David McLaughlin
Chief Financial Officer

Handwritten notes: hrc 3/30/10

cc: Gene Shteynberg, CTDEP
James Chow, Marilyn St. Fleur, EPA Region 1
A. Davis, Dewey & LeBoeuf LLP
K. King, LEP, ERM Consulting & Engineering, Inc.